## BSDR LLC 731 Lexington Avenue New York, NY 10022

August 26, 2013

### FOIA CONFIDENTIAL TREATMENT REQUEST

#### Submitted via FedEx and via email

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance Commodity Futures Trading Commission

Three Lafayette Centre 1155 21<sup>st</sup> Street, N.W.

Washington, D.C. 20581

via email: FOIAsubmissions@cftc.gov

Re: Freedom of Information Act ("FOIA") Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission (the "Commission") Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the Regulations of the Commission, by BSDR LLC, as proposed operator of a swap data repository

#### Ladies and Gentlemen:

Pursuant to Section 21 of the Commodity Exchange Act and Part 49 of the regulations of the Commission, BSDR LLC (the "<u>Applicant</u>"), as proposed operator of a swap data repository, submitted to the Commission a third amended Swap Data Repository Application for Registration on Form SDR dated August 2, 2013 (together with each exhibit thereto, the "<u>Third Amended Application</u>").

On August 12, 2013, the staff of the Commission provided the Applicant with certain comments and questions with respect to the Applicant's ability to accept and report swap data as set forth in Part 43, Part 45, Part 46 and Part 50 of the Commission's Rules reporting (the "Staff Questions"). The Applicant submitted its responses to the Staff Questions (the "Staff Questions Responses") as well as twenty-one (21) .csv files, which are attached to the Applicant's submission (the "CSV Files").

The Applicant hereby requests that the Confidential Information (as defined below) be accorded confidential treatment on the grounds that it would reveal the Applicant's trade secrets and confidential commercial or financial information. We request this confidential treatment for an indefinite period.

Please promptly inform the following of any request for the Confidential Information or its contents made pursuant to FOIA or the Commission's rules so that we may substantiate the foregoing request for confidential treatment in accordance with Part 145.9 of the Commission's regulations.

Commodity Futures Trading Commission Page 2

David Levine General Counsel Bloomberg L.P. 731 Lexington Avenue New York, NY 10022

The Staff Questions Responses and CSV Files identified on Annex A hereto are collectively referred to herein as the "<u>Confidential Information</u>".

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information with the words "Confidential Treatment Requested by BSDR LLC" and have numbered each page of the Staff Questions Responses with an identifying number and code beginning with "003600" and ending with "003628". This numbering scheme continues the numbering scheme that the Applicant has used for the materials it has submitted to the Commission to date, each page of which was numbered with an identifying number and code beginning with "000001" and ending with "003599".

[signature page follows]

Commodity Futures Trading Commission Page 3

Please acknowledge receipt of this letter by stamping the enclosed copy of this letter and returning it via the pre-paid envelope included with the materials.

Please contact the undersigned at (212) 617-0690 with any questions regarding this matter.

Thank you for your attention to this matter.

Very truly yours,

Irene Moyseyenko Legal Counsel

Bloomberg L.P.

731 Lexington Avenue New York, NY 10022

cc:

Division of Market Oversight, Commodity Futures Trading Commission (Email: submissions@cftc.gov)

Laurie Gussow, Division of Market Oversight, Commodity Futures Trading Commission (Email: lgussow@cftc.gov)

Jonathan Lave, Division of Market Oversight, Commodity Futures Trading Commission (Email: jlave@cftc.gov)

Abigail S. Knauff, Division of Market Oversight, Commodity Futures Trading Commission (Email: aknauff@cftc.gov)

# Annex A Confidential Information

Name of Confidential Information	Identifying Number and Code
Staff Questions Responses	003600 - 003628
CSV Files attached to Applicant's Submission	N/A